

Permit Fact Sheet

General Information

Permit Number:	WI-0063878-03-0
Permittee Name:	Roth Feeder Pig Inc
Address:	31961 Hummingbird Ln
City/State/Zip:	Wauzeka, WI 53826
Discharge Location:	SE1/4 of the SW1/4 T7N, R4W, Sec. 2, Town of Wauzeka, Crawford County
Receiving Water:	City of Boscobel-Wisconsin River Watershed and the Lower Wisconsin River Basin and groundwaters of the state
StreamFlow (Q _{7,10}):	NA
Stream Classification:	NA

Animal Units					
Animal Type	Current AU		Proposed AU (Note: If all zeroes, expansions are not expected during permit term)		
	Mixed	Individual	Mixed	Individual	Date of Proposed Expansion
Steers or Cows (400 lbs. to market)	60	60	0	0	
Beef Calves (under 400 lbs.)	12	0	0	0	
Pigs (55 lbs. to market)	60	60	0	0	
Sows (each)	1160	1160	0	0	
Boars (each)	10	8	0	0	
Pigs (up to 55 lbs.)	365	365	0	0	
Total	1667	1228	0	0	

Facility Description

Roth Feeder Pig, Inc. is a single-site hog and beef operation owned and operated by Howard (AV) Roth in Wauzeka, WI. The operation maintains a herd size of 1,667 mixed animal units, consisting of 2,900 sows, 3,650 gilts, 150 growers, 20 boars, 60 beef cows and 60 calves. All swine are 100% confined, and all swine manure is stored beneath animal housing. A roofed building with concrete flooring is used for composting mortalities. Roth Feeder Pig, Inc. has at least 401 days of storage for liquid manure and process wastewater and at least 59 days of storage for solid manure.

The operation also raises 60 beef cow and calf pairs on pastures surrounding the hog facility. During the growing season there are more than 400 acres of pasture available for grazing. The animals are brought to an open lot in the production area for sorting and remain there for approximately 2-4 weeks out of the year. There is another open lot in the production area designated for sick cows in this herd. These lots will be evaluated and monitored as required by the WPDES permit. Animals will be winter grazed on fields that are included in the Nutrient Management Plan (NMP). All manure from the lots will be applied in accordance with the approved NMP. Manure that is applied resulting from pastured beef animals will also be accounted for in the NMP. The submittal of a Pasture Management Plan for department approval is included in the Schedules section of the permit.

Since the size of the operation will continue to exceed 1,000 animal units as defined in Ch. NR 243, Wis. Adm. Code, an application has been submitted for reissuance of their Wisconsin Pollutant Discharge Elimination System (WPDES) permit. This will be the second permit reissuance for this facility.

The department has conditionally approved the Nutrient Management Plan for Roth Feeder Pig, Inc. The operation currently has 489.1 acres (303.5 owned and 183.6 controlled through contracts, rental agreements or leases, or under manure agreements) of which 455.8 are spreadable acres. Roth Feeder Pig, Inc. will annually generate approximately 3,098,152 gallons of manure and process wastewater and 240 tons of solid manure in the first year of the permit term.

The proposed permit is for 5 years, and would expire on June 30th, 2026.

The owner of this facility has also submitted a separate WPDES permit application for a new swine CAFO facility called Roth Feeder Pig II. Roth Feeder Pig II is proposed to be built in Marietta Township and that application will be processed through a completely separate action.

Sample Point Designation For Animal Waste		
Sample Point Number	Sample Point Location, WasteType/sample Contents and Treatment Description (as applicable)	
001	1979 Underbarn Concrete Basin - Sample point 001 is for the manure storage facility under the Red Nursery. This underbarn basin is a vertical wall concrete structure with a capacity of 134,000 gallons. An engineering evaluation is required for this facility, see Schedules section for due dates.	
002	2001 Underbarn Concrete Basin - Sample Point 002 is for the manure storage facility under the 2001 Gestation Barn. This underbarn basin is a vertical wall concreted structure with a capacity of 1,290,000 gallons. Manure from the pull plug structure under the 1992 Farrowing Barn flows into this storage facility. An engineering evaluation is required for this facility, see Schedules section for due dates.	
003	2007 Underbarn Concrete Basin - Sample Point 003 is for the manure storage facility under the 2007 Gestation Barn. This underbarn basin is a vertical wall concreted structure with a capacity of 1,290,000 gallons. Manure from the pull plug structure under the 2007 Farrowing Barn flows into this storage facility. An engineering evaluation is required for this facility, see Schedules section for due dates.	
004	Misc. Solid Manure - Sample point 004 is for solid manure or compost sources that are directly land applied and not stored in a waste storage facility. This includes solid sources such as solid manure scraped from the beef sorting lot, sick cow lot, bed pack steer manure or composted mortalities. Representative samples shall be taken for each manure source type.	
005	2011 Underbarn Concrete Basin - Sample Point 005 is for the manure storage facility under the 2011 GDU Barn. This underbarn basin is a vertical wall concreted structure with a capacity of 690,000 gallons. Manure from the pull plug structure under the 1979 Red Nursery flows into this storage facility.	

Sample Point Designation For Animal Waste		
Sample Point Number	Sample Point Location, WasteType/sample Contents and Treatment Description (as applicable)	
007	Beef Sorting Lot - Sample point 007 is for visual monitoring and inspection of the earth lot located on the west side of the driveway, north and east of the Stanchion Barn, and associated runoff control system. Proper operation and maintenance is required to ensure discharges meet permit requirements. Weekly inspections are required and shall be recorded according to the monitoring and inspection program. An engineering evaluation of the lot and runoff control system shall be submitted according to the Schedules section of the permit.	
008	Sick Cow Lot - Sample point 008 is for visual monitoring and inspection of the outdoor earth lot located north of the production area, east of the compost building, and associated runoff control system. Proper management will be needed to ensure discharges to waters of the state do not occur. Weekly inspections are required when this facility is in use and shall be recorded according to the monitoring and inspection program. An engineering evaluation of the lot and runoff control system shall be submitted according to the Schedules section of the permit.	
009	Stormwater Runoff Control System - Sample point 009 is for visual monitoring and inspection of all production site storm water conveyance systems. This includes roof gutter and downspout structures, drainage tile systems, grassed waterways and other diversion systems that transport uncontaminated storm water. Proper operation and maintenance is required to keep uncontaminated runoff diverted away from manure and process wastewater handling systems. Weekly inspections are required and shall be recorded according to the monitoring and inspection program.	

1 Livestock Operations - Proposed Operation and Management

Production Area Discharge Limitations

Beginning on the effective date of the permit, the permittee may not discharge pollutants from the operation's production area (e.g., manure storage areas, outdoor animal lots, composting and leachate containment systems, milking center wastewater treatment/containment systems, raw material storage areas) to navigable waters, except in the event a 25-year, 24-hour rainfall event (or greater) causes the discharge from a structure which is properly designed and maintained to contain a 25-year, 24-hour rainfall event for this location as determined under s. NR 243.04. If an allowable discharge occurs from the production area, state water quality standards may not be exceeded.

Runoff Control

The permit requires control of contaminated runoff from all elements of the production area to prevent a discharge of pollutants to navigable waters in accordance with the Production Area Discharge Limitations and to comply with surface water quality standards and groundwater standards. Beginning on the effective date of this permit, (if needed) interim measures shall be implemented to prevent discharges of pollutants to navigable waters. In addition, permanent runoff control system(s) shall be designed, operated and maintained in accordance with the requirements found in USDA Natural Resources Conservation Service standards and ch. NR 243, Wis. Adm. Code. If any upgrading or modifications to runoff controls are necessary, formal engineering plans and specifications must submitted to the Department for approval.

Manure and Process Wastewater Storage

The permit requires the operation to have adequate storage for manure and process wastewater and that storage or containment facilities are designed, operated and maintained to prevent overflows and discharges to waters of the state. In order to prevent overflows, the permittee must maintain levels of materials in liquid storage or containment facilities at or below certain levels including a one foot margin of safety that can never be exceeded. If any upgrading or modifications

to the storage facilities are necessary, formal engineering plans and specifications must be submitted to the Department for approval.

The permittee must maintain 180 days of storage, unless temporary reductions in required storage are approved by the Department. The permittee currently has approximately 401 days of storage for liquid manure and process wastewater and at least 59 days of storage for solid manure.

As an emergency winter spreading strategy, the farm will utilize storage from a proposed operation named Roth Feeder Pig II. This operation would be proposed for construction in 2021. Roth Feeder Pig, Inc. and Roth Feeder Pig II will maintain at least 1,000,000 gallons of storage for a winter contingency plan, which equivalates out to 38 days of manure production. This will be evaluated on an annual basis by November 30th of each year, Roth Feeder Pig, Inc. and Roth Feeder Pig II, will document that there is 180 days of storage available and the additional minimum of 1,000,000 gallons of storage for an emergency winter plan. The department concurs with this plan and will review annually through the Annual Update provided from the farm.

Ancillary Service and Storage Areas

The permittee shall take preventative maintenance actions and conduct visual inspections to minimize pollutant discharges from areas of the operation that are not part of the production area or land application areas. These areas are called ancillary service and storage areas and include access roads, shipping and receiving areas, maintenance areas, refuse piles and CAFO outdoor vegetated areas.

Nutrient Management

With 1,667 mixed animal units (2,900 sows, 3,650 gilts, 150 growers, 20 boars, 60 beef cows and 60 calves), it is estimated that approximately 3,098,152 gallons of manure and process wastewater and 240 tons of solid manure will be produced per year. The permittee owns *approximately* 303.5 acres of cropland and rents about 183.6. Given the rotation commonly used by the permittee, 455.8 acres are available (or open) to receive manure and process wastewater on an annual basis. The permit requires all landspreading of manure and process wastewater be completed in accordance with an approved nutrient management plan. The permit will require sampling and analysis of manure and process wastewater that will be landspread. Landspreading rates must be adjusted based on sample analysis. The permit requires the permittee to maintain a daily log that documents landspreading activities. The permit also requires the submittal of an annual report that summarizes all landspreading activities. Plans must be updated annually to reflect cropping plans and other operational changes. Among the requirements, the plans must include detailed landspreading information including field by field nutrient budgets.

The permittee is required to implement a number of practices to address potential water quality impacts associated with the land application of manure and process wastewater. Among the permit conditions are restrictions on manure ponding, restrictions on runoff of manure and process wastewater from cropped fields, and setbacks from wells and direct conduits to groundwater (e.g., sinkholes, fractured bedrock at the surface). In addition, the permittee must implement a phosphorus based nutrient management plan that addresses phosphorus delivery to surface waters by basing manure and process wastewater applications on soil test phosphorus levels or the Wisconsin Phosphorus index. Additional phosphorus application restrictions apply to fields that are high in soil test phosphorus (>100 ppm).

The permittee must also implement conservation practices when applying manure near navigable waters and their conduits, referred to as the Surface Water Quality Management Area (SWQMA). These practices include a 100-foot setback from navigable waters and their conduits, a 35-foot vegetated buffer adjacent to the navigable water or conduit, or a practice that provides equivalent pollutant reductions equivalent to or better than the 100-foot setback.

In addition, the permittee must comply with restrictions on land application of manure and process wastewater on frozen or snow-covered ground. Included in these restrictions is a prohibition on surface applications of solid manure ($\geq 12\%$ solids) on frozen or snow-covered ground during February and March. Non-emergency surface applications of liquid manure (<12%) on frozen or snow-covered ground are prohibited.

Monitoring and Sampling Requirements

The permittee must submit a monitoring and inspection program that outlines how the permittee will conduct self-inspections to determine compliance with permit conditions. These self-inspections include visual inspections of water lines, diversion devices, storage and containment structures and other parts of the production area. The permit requires periodic inspections and calibrations of landspreading equipment. The permittee must take corrective actions to problems identified from inspections or otherwise notify the Department. Samples of manure, process wastewater and soils receiving land applied materials from the operation must also be collected and analyzed.

Sampling Points

The permit identifies the different sources of land applied materials (e.g., manure storage facilities, milking centers, egg-washing facilities) as “Sampling Points.” For these Sampling Points, the permittee is required to sample and analyze the different sources for nutrients and other parameters which serve as the basis for determining rates of application for these materials. Other areas are also identified as Sampling Points as a means of identifying them as areas requiring action by the permittee, such as an upgrade or evaluation of a certain system or structure (e.g., runoff control systems), even though sampling is not actually required.

Sample Point Number: 001- 1979 Underbarn Concrete Basin; 002- 2001 Underbarn Concrete Basin; 003- 2007 Underbarn Concrete Basin; 005- 2011 Underbarn Concrete Basin

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Nitrogen, Total		lb/1000gal	2/Month	Grab	
Nitrogen, Available		lb/1000gal	2/Month	Calculated	
Phosphorus, Total		lb/1000gal	2/Month	Grab	
Phosphorus, Available		lb/1000gal	2/Month	Calculated	
Solids, Total		Percent	2/Month	Grab	

1.1.1 Changes from Previous Permit

Sample Point 001: Language was added to reflect that an engineering evaluation requirement is included in the Schedules Section of the permit

Sample Point 002: Language was added to reflect that an engineering evaluation requirement is included in the Schedules Section of the permit

Sample Point 003: Language was added to reflect that an engineering evaluation requirement is included in the Schedules Section of the permit

1.1.2 Explanation of Operation and Management Requirements

Elevation of the manure in these facilities will be monitored in accordance with the monitoring and inspection program. Manure will be sampled and applied in accordance with the department approved Nutrient Management Plan.

Sample Point Number: 004- Misc. Solid Manure

Monitoring Requirements and Limitations					
Parameter	Limit Type	Limit and Units	Sample Frequency	Sample Type	Notes
Nitrogen, Total		lbs/ton	Quarterly	Grab	
Nitrogen, Available		lbs/ton	Quarterly	Calculated	
Phosphorus, Total		lbs/ton	Quarterly	Grab	
Phosphorus, Available		lbs/ton	Quarterly	Calculated	
Solids, Total		Percent	Quarterly	Grab	

1.1.3 Changes from Previous Permit

Sample Point 004: Updated to account for solids generated from the Sick Cow Lot

1.1.4 Explanation of Operation and Management Requirements

The solid manure will be collected, sampled, and applied in accordance with the department approved Nutrient Management Plan.

Sample Point Number: 007- Beef Sorting Lot; 008- Sick Cow Lot, and 009- Stormwater Runoff Controls

1.1.5 Changes from Previous Permit

Sample Point 007: Language was added to reflect that an engineering evaluation requirement is included in the Schedules Section of the permit, and to add standard language

Sample Point 008: Sample point was added to include the visual monitoring and inspection of the runoff control system for the Sick Cow Lot, and to reflect that an engineering evaluation requirement is included in the Schedules Section of the permit

Sample Point 009: Sample point was added to include the visual monitoring and inspection of all production site storm water conveyance systems

1.1.6 Explanation of Operation and Management Requirements

The Beef Sorting Lot and Sick Cow Lot will be visually monitored and inspected when they are being utilized to ensure compliance with the zero discharge requirements of the WPDES permit.

Proper operation and maintenance is required to keep uncontaminated runoff diverted from manure and process wastewater handling systems.

2 Schedules

2.1 Monitoring & Inspection Program

Use of the department's monitoring and inspection program template is encouraged, but optional.

Required Action	Due Date
Proposed Monitoring and Inspection Program: Consistent with the Monitoring and Sampling Requirements subsection, the permittee shall submit an updated monitoring and inspection program within 30 days of the effective date of this permit.	08/01/2021

2.2 Emergency Response Plan

Required Action	Due Date
Develop Emergency Response Plan: Develop and submit a written Emergency Response Plan within 30 days of permit coverage.	08/01/2021

2.3 Nutrient Management Plan

Submit annual nutrient management plan (NMP) updates by March 31 of each year. Note, in addition to annual NMP updates, submit NMP amendments and substantial revisions to the department for written approval prior to implementation of any changes to the NMP.

Required Action	Due Date
Management Plan Submittal: Submit any necessary updates to the Nutrient Management Plan to meet the conditions outlined in this permit (see conditions in the Livestock Operational and Sampling Requirements section).	08/01/2021
Management Plan Annual Update #1: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department form 3400-025D.	03/31/2022
Management Plan Annual Update #2: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department form 3400-025D.	03/31/2023
Management Plan Annual Update #3: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department form 3400-025D.	03/31/2024
Management Plan Annual Update #4: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department form 3400-025D.	03/31/2025
Management Plan Annual Update #5: To include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department form 3400-025D.	03/31/2026
Ongoing Management Plan Annual Updates: Continue to submit Annual Updates to the Nutrient Management Plan until permit reissuance has been completed, to include actual cropping, tillage, and nutrient application data from the previous calendar or crop year, consistent with the requirements of department form 3400-025D.	06/30/2026

2.4 Annual Reports

Submit Annual Reports by January 31st of each year in accordance with the Annual Reports subsection in Standard Requirements.

Required Action	Due Date
Submit Annual Report #1: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2022
Submit Annual Report #2: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2023
Submit Annual Report #3: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2024
Submit Annual Report #4: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2025
Submit Annual Report #5: To include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	01/31/2026
Ongoing Annual Reports: Continue to submit Annual Reports until permit reissuance has been completed, to include monitoring and inspection results from the previous 12 months, consistent with the requirements of department form 3400-025E.	06/30/2026

2.5 Pasture Management Plan

Submit and Implement the Pasture Management Plan after Approval

Required Action	Due Date
Submit Pasture Management Plan: Submit a Pasture Management Plan for all non-feedlot areas where the cow/calves are pastured for Department review and approval. The plan must include information detailing the pasture boundaries, density of livestock, timeframes, vegetative type, percent cover, and other management practices to insure proper operation of the area as a pasture. Once approved, implement the Pasture Management Plan.	08/01/2021

2.6 Runoff Control System - Engineering Evaluation

Required Action	Due Date
Complete Engineering Evaluation: Retain a qualified expert to complete an engineering evaluation for the sick cow lot and the beef sorting lot runoff control systems and report the name of the expert to the Department.	08/01/2021
Written Description of Existing System: Submit a written description of the existing runoff control systems and its adequacy to permanently meet the conditions in the Production Area Discharge Limitations and Runoff Control subsections and s. NR 243.15, Wis. Adm. Code. (See Standard Requirements for report details.)	12/01/2021
Plans and Specifications: Submit plans and specifications for Department review and approval to permanently correct any adverse runoff control conditions in accordance with Chapter 281.41, Wis. Stats., and Chapter NR 243, Wis. Adm. Code.	06/01/2022

Corrections and Post Construction Documentation: Complete construction of runoff controls that permanently correct any adverse runoff control conditions in concurrence with and approval by the Department, by the specified Date Due. Submit post construction documentation within 60 days of completion of the project.	12/31/2022
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2.7 Manure Storage Facilities - Engineering Evaluations

This shall include the 1979 Nursery Barn underbarn storage, the 1992 Farrowing Barn and 2001 Gestation Barn basins and associated pull-plug system, the GDU underbarn storage and the 2007 Farrowing Barn and 2007 Gestation Barn basins and associated pull-plug system.

Required Action	Due Date
Retain Expert: Retain a qualified expert to complete an engineering evaluation for the manure storage facilities and report the name of the expert to the Department.	01/01/2022
Written Report: Submit a written report evaluating the existing manure storage facility's ability to meet the conditions in the Production Area Discharge Limitations and Manure and Process Wastewater Storage subsections and s. NR 243.15, Wis. Adm. Code. (See Standard Requirements for report details.)	10/01/2022
Plans and Specifications: Submit plans and specifications for Department review and approval in accordance with Chapter 281.41, Wis. Stats., and Chapter NR 243, Wis. Adm. Code, to permanently correct any adverse manure storage conditions.	04/01/2023
Corrections and Post Construction Documentation: Complete construction on the manure storage facility that permanently corrects any adverse conditions in concurrence with and approval by the Department, by the specified Date Due. Submit post construction documentation within 60 days of completion of the project.	12/31/2023

2.8 Permit Application Submittal

The permittee shall file an application for permit reissuance in accordance with NR 200, Wis. Adm. Code.

Required Action	Due Date
Permit Application Submittal: Submit a complete permit application to the Department no later than 180 days prior to permit expiration.	01/01/2026

2.9 Explanation of Schedules

The Schedules include annual reporting requirements for Annual Updates and Nutrient Management Plan Updates, as well as an updated Monitoring and Inspection Program and Emergency Response Plan. These are standard requirements for reissued WPDES permit Schedules.

A Pasture Management Plan is included in the Schedules to provide details on the pastured beef cow and calf herd for department approval.

Due to the age of the Beef Sorting Lot and the new use of the Sick Cow Lot, the Schedules include evaluations of these facilities to determine if the lots and their associated runoff control systems meet permit requirements. Permanent upgrades will be required to correct any adverse runoff control conditions.

The Schedules include storage facility evaluation requirements. Due to the age of these facilities, evaluations are included to determine if these facilities meet permit requirements. Permanent upgrades will be required to correct any adverse manure storage conditions.

Other Comments:

Roth Feeder Pig, Inc.'s current permit lists the discharge receiving water as "Boydtown Creek, in the Knapp Creek Watershed and the Lower Wisconsin River Basin", which will be updated to the current watershed name of "City of Boscobel – Wisconsin River Watershed and the Lower Wisconsin River Basin" for this proposed permit.

Roth Feeder Pig Inc. is an existing source CAFO. This WPDES permit action is an integrated analysis action under NR 150.20(2), Wis. Adm. Code, and does not require a separate action under NR 150, Wis. Adm. Code.

Attachments:

Substantial Compliance Determination

Map(s)

Plan Approval Letter(s)

Proposed Expiration Date:

June 30, 2026

Prepared By:



Claire O'Connell

Agricultural Runoff Management Specialist

(608) 963-1463

Claire.OConnell@wisconsin.gov

Date: April 14, 2021

Substantial Compliance Determination

Permittee Name: Roth Feeder Pig Inc		Permit Number: 0063878-03-0
	Compliance?	Comments
Discharge Limits	Yes	
Sampling/testing requirements	Yes	
Groundwater standards	Yes	
Reporting requirements	Yes	
Compliance schedules	Yes	
Management plan	Yes	
Other:	Yes	
Enforcement Considerations	None	
In substantial compliance?	Yes Comments: None Signature: Claire O'Connell Date: 04/12/21 <i>Claire L. O'Connell</i>	
	Concurrence: CLOC	Date: 04/12/21

WPDES PERMIT REISSUANCE FACILITY EVALUATION

PREPARED FOR:

ROTH FEEDER PIG, INC
A.V. ROTH

31961 HUMMINGBIRD LANE
WAUZEKA, WI 53826

PREPARED BY:

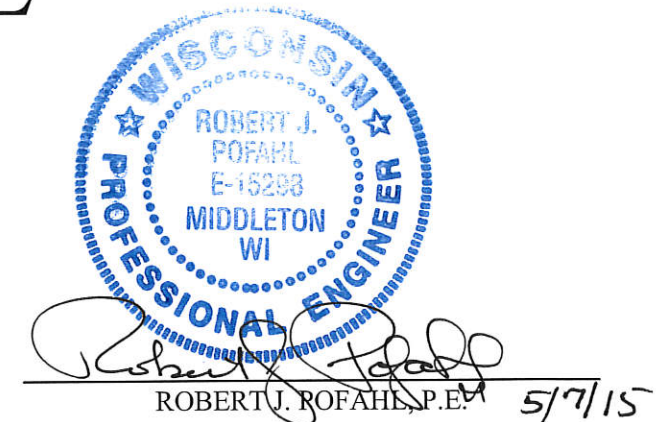
RESOURCE ENGINEERING ASSOCIATES, INC
3510 PARMENTER ST., SUITE 100
MIDDLETON, WI 53562

MAY 2015

A.V. ROTH, OWNER

PLAN SET
COVER
EXISTING SITE MAP
BEEF LOTS MAP

C1
C100
C101

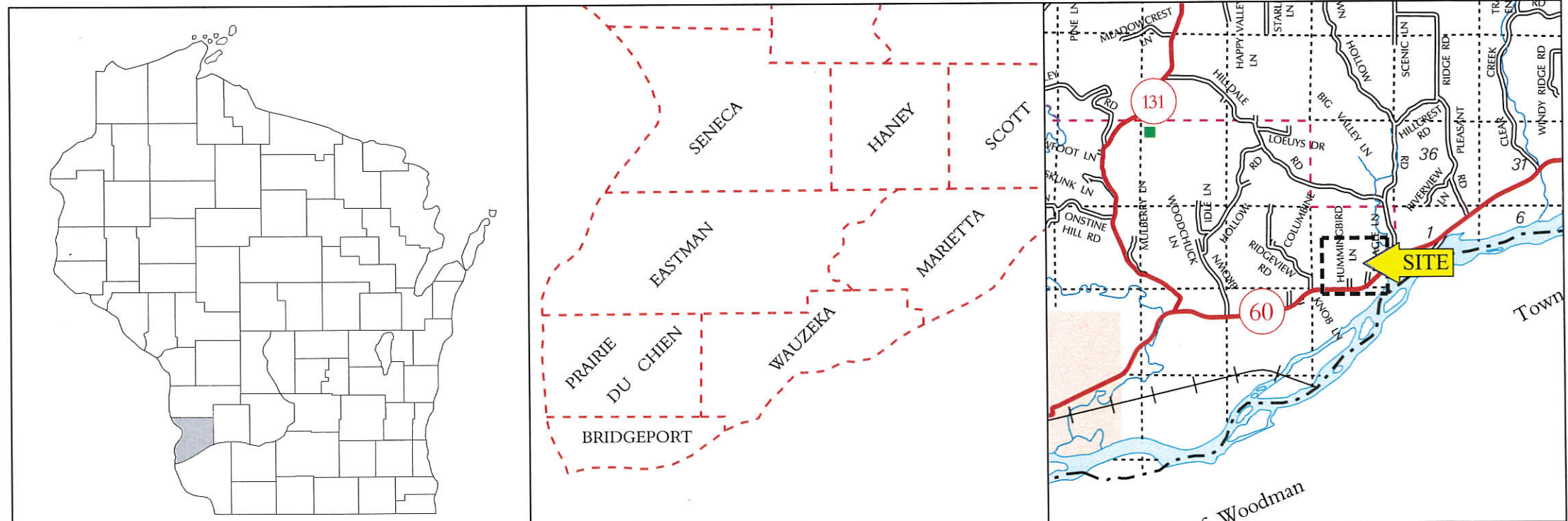


To the best of my professional knowledge, judgement, and belief,
these plans meet the following applicable NRCS standards:



Diggers Hotline: Wisconsin's One-Call Center

CALL 811 or (800) 242-8511 | (877) 500-9592 (emergency only)



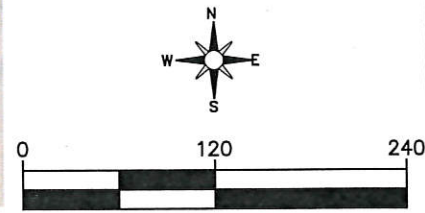
WISCONSIN
CRAWFORD COUNTY

CRAWFORD COUNTY
WAUZEKA TOWNSHIP

WAUZEKA TOWNSHIP
T7N R4W SE1/4 of SW1/4 of Section 2
T7N R4W SW1/4 of SE1/4 of Section 2



- LEGEND
- EXISTING CONTOURS
 - E-W EXISTING WELL
 - BM-1 BENCHMARK
 - TE-1 TEST PIT (8/3/2007)
 - SURFACE FLOW



REVISIONS:	
DATE	
DATE	
DATE	
DATE	

Resource Engineering Associates, Inc.
3510 Parmenter Street, Suite 100
Middleton, Wisconsin 53562-2507
Phone: 608-831-5522
Fax: 608-831-6564
Web: www.reaeng.com

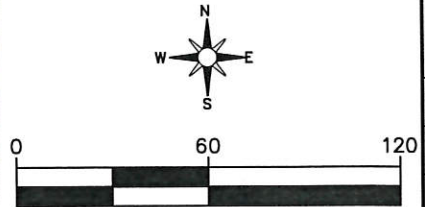


EXISTING SITE MAP
WPDES PERMIT REISSUANCE
ROTH FEEDER PIG, INC
31961 HUMMINGBIRD LANE
WAUZEKA, WI 53826

DATE: APRIL, 2015
DRAWN: RAN
CHECKED: RJP
APPROVED: RJP
DRAWING NAME: 1502 Topo.dwg
PROJECT NUMBER: 150002.1



- LEGEND**
- EXISTING CONTOURS
 - E-W
 - EXISTING WELL
 - BM-1
 - BENCHMARK
 - TE-1
 - TEST PITS (8/3/2007)
 - SURFACE FLOW



REVISIONS:	
DATE	
DATE	
DATE	
DATE	

Resource Engineering Associates, Inc.
3510 Parmenter Street, Suite 100
Middleton, Wisconsin 53562-2507
Phone: 608-831-5522
Fax: 608-831-6564
Web: www.reaeng.com



BEEF LOTS MAP
WPDES PERMIT REISSUANCE
ROTH FEEDER PIG, INC
31961 HUMMINGBIRD LANE
WAUZEKA, WI 53826

DATE: APRIL, 2015
DRAWN: RAN
CHECKED: RJP
APPROVED: RJP
DRAWING NAME: 1502 Topo.dwg
PROJECT NUMBER: 150002.1

State of Wisconsin
**DEPARTMENT OF NATURAL
RESOURCES**
Fitchburg Service Center
3911 Fish Hatchery Road
Fitchburg, WI 53711

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



December 2, 2020

WPDES Permit No. WI-0063878-02-0
Crawford County

AV Roth
Roth Feeder Pig
31961 Hummingbird Lane
Wauzeka, WI 53826

**SUBJECT: Permit Reissuance Inspection Summary for Roth Feeder Pig, WPDES
Permit No. WI-0063878-02-0**

Dear Mr. Roth,

On October 15, 2020 the Wisconsin Department of Natural Resources (WDNR) conducted a site inspection for Roth Feeder Pig as part of the WPDES permit reissuance process. A copy of this inspection report is attached. After file review and discussions held during the inspection, it has been determined that certain reviewable facilities in the production area will be included in the compliance schedule for the next permit term. Please refer to the last page of the enclosed report.

If you have additional questions regarding the inspection report or the permitting process, please contact me.

Sincerely,

Claire O'Connell
Wastewater Specialist – Bureau of Watershed Management
Wisconsin Department of Natural Resources
1500 North Johns Street
Dodgeville, WI 53533
Cell: (608) 963-1463
Claire.OConnell@wisconsin.gov

Attachments: Inspection Report October 15, 2020

ECC: Laura Bub – WDNR
Mark Cain – WDNR
Tony Salituro – WDNR
Bob Pofahl – Resource Engineering Associates, Inc.
Dan Wierzbza – Resource Engineering Associates, Inc
Nikki Wagner – Insight FS
Dave Troester – Crawford County LCD

CAFO Compliance Report: December 2, 2020

Inspection Date: October 15th, 2020

Site Visit Type: Reissuance Inspection

Operation Name: Roth Feeder Pig

WPDES Permit No: WI-0063878-02-0

Operation Address: 31961 Hummingbird Lane, Wauzeka, WI 53826

Onsite Representatives: AV Roth (Roth Feeder Pig), Nikki Wagner (Insight FS), Bob Pofahl and Dan Wierzba (REA Engineering)

DNR Staff/Report Author: Claire O'Connell

On August 25th, 2020 at 10:30am, Claire O'Connell and Mark Cain (WDNR) met with AV Roth (Roth Feeder Pig), Nikki Wagner (Insight FS), Dan Wierzba and Bob Pofahl (REA Engineering) to conduct a site inspection for Roth Feeder Pig's permit reissuance for permit number WI-0063878-02-0, which expires June 30th, 2021. It was 50°F and sunny with no precipitation, and no rain fell 24 hours prior to the inspection. No water samples were collected by WDNR staff and the site visit concluded at approximately 1:30pm.



Figure 1. Aerial view of production area

Site Observations

Waste Storage Facilities

Roth Feeder Pig currently utilizes two gestation barns, two farrowing barns, a roofed compost storage building, a nursery barn, and a gilt development unit barn (GDU). The roofed compost building has four walls, a concrete floor, and processes mortalities and sawdust with an inconsequential amount of bedding. No liquid was observed to be leaving the building. The 1992 farrowing barn employs a pull plug system that directs manure to the underbarn storage of the 2001 gestation barn. Similarly, the 2007 farrowing barn uses a pull plug system allowing manure to flow to the underbarn storage of the 2007 gestation barn. The GDU and nursery barns have stand-alone slatted floor manure basins. Manure is periodically pumped from these storages to be land applied. The GDU barn was constructed in 2011 in tandem with an expansion of the 2007 farrowing barn storage facility. See Figure 1 for the locations of these buildings within the production area



Figure 2. Exterior of Compost building facing northeast



Figure 3. Interior of compost building facing east.



Figure 4. 1992 Farrowing Barn (left), facing west



Figure 5. 2011 GDU Barn, facing east



Figure 6. 2007 Farrowing Barn, facing south



Figure 7. 2007 Gestation Barn, facing southwest

Beef Sorting Operation

Roth Feeder Pig operates a beef cattle sorting operation within the production area. This consists of a stanchion barn and two cattle sorting areas. There is also a sick cow building with an associated outdoor lot that was not in use during the last inspection. For roughly 2 weeks a year, approximately 50-60 head of cattle are contained and sorted within the production area. The sorting lot runoff is directed to a vegetated area from the stanchion barn via an underground outlet pipe traveling across the access road (see figure 1 for flow paths).



Figure 8. Sick Cow barn and outdoor lot, facing northwest



Figure 9. Runoff outlet into vegetated area, facing southeast



Figure 10. Cattle sorting and runoff area facing south



Figure 11. Old stanchion barn and sorting area, facing west

Records Review

Roth Feeder Pig was able to provide the following records upon request:

- emergency response plan
- daily hauling logs
- current nutrient management plan
- current WPDES permit
- updated monitoring and inspection plan (provided October 16th)

Summary

Substantial Compliance

The permittee is in substantial compliance with the permit

Items for Next Permit

Roth Feeder Pig does not plan on any production area or animal unit expansions for the next permit term. DNR representatives discussed upcoming permit deadlines and next steps in the permitting process. The need for information regarding manure storages, the beef sorting lot runoff control system, as well as the sick cow open lot runoff control system was also discussed.

Due to facility age and need for additional information, evaluations of the following will be included in the compliance schedule of the next permit term:

- 1979 Nursery Barn underbarn storage
- 1992 Farrowing Barn and 2001 Gestation Barn basins and associated pull-plug system
- GDU underbarn storage
- 2007 Farrowing Barn and 2007 Gestation Barn basins and associated pull-plug system

Due to facility age and changes in production area operations, an evaluation of the following will be included in the compliance schedule of the next permit term:

- runoff control system for the cattle sorting areas

Due to the new use and purpose for this area, an evaluation of the following will be included in the compliance schedule of the next permit term:

- runoff control system for the sick cow open lot



April 12th, 2021

Crawford County
Approval

Howard Roth
Roth Feeder Pig, Inc
31961 Hummingbird Ln
Wauzeka, WI 53826

SUBJECT: Final Amended Conditional Approval of Roth Feeder Pig, Inc Nutrient Management Plan, WPDES Permit No. 0063878-03-0

Dear Mr. Roth:

After completing a review of Roth Feeder Pig, Inc 2021-2025 Nutrient Management Plan (NMP) the Wisconsin Department of Natural Resources (Department) is providing conditional approval that it is consistent with s. NR 243.14, Wis. Adm. Code. This part of your WPDES permit application is now ready for the public notice and comment process as required by Ch. 283 Stats.

Before applying manure onto approved fields each season, the Department recommends Roth Feeder Pig, Inc review the NMP with those individuals involved with manure applications to ensure all remain familiar with the approved manure spreading protocol, spreading maps, field and map verification, record keeping requirements, and all the conditions of this approval. Specifically, some fields in Roth Feeder Pig, Inc may have:

- Soils that may have bedrock or groundwater within 24 inches of surface,
- Multiple setback areas due to streams, conduits to streams, grassed waterways, wetlands or wells, and
- Evidence of possible soil erosion/flow channels. Note: road ditches or other man-made channels may be considered flow channels or conduits to navigable water and may be subject to a SWQMA and setback.

Reviewing the NMP and checking fields for these features and soil conditions prior to manure applications will help Roth Feeder Pig, Inc maintain compliance with their WPDES permit and Ch. NR 243 requirements.

FINDINGS OF FACT

The Department confirms that:

1. A current swine and beef herd size of 1,667 animal units (2,900 sows, 3,650 gilts, 150 growers, 20 boars, 60 beef cows, and 60 calves). Currently there are no planned expansions in the next permit term.
2. Manure generation and spreading records indicate your herd will annually generate approximately 3,098,152 gallons of manure and process wastewater and 240 tons of solid manure in the first year of the permit term.
3. The use of application restriction options 2 and 5 within surface water quality management areas.
4. The use of phosphorus delivery method P Index.
5. That Roth Feeder Pig, Inc currently has 489.1 acres (303.5 owned and 183.6 controlled through contracts, rental agreements or leases, or under manure agreements) of which 455.8 are spreadable acres.

6. That some fields included in the NMP are directly adjacent to or have high potential to deliver nutrients and sediment to Unnamed (WBIC 5035112) (listed 303(d) impaired water by 'Impairment Unknown') and the Wisconsin River (listed 303(d) impaired water by 'PCB's' & 'Mercury').
7. That some fields included in the NMP are directly adjacent to or have high potential to deliver nutrients and sediment to outstanding/exceptional waters including Boydtown Creek.
8. That Roth Feeder Pig, Inc currently has at least 401 days of storage for liquid manure, process wastewater and rainfall and at least 59 days of storage for solid manure.

	<i>Total Volume</i>
WSF 1	134,000 gal
WSF 2	1,290,000 gal
WSF 3	1,290,000 gal
WSF 4	690,000 gal

9. That no fields are tiled.
10. That all fields will be checked for the following features prior to/during manure or process wastewater applications: soil areas with possible shallow groundwater (i.e., within 24 inches of surface) at the time of manure application; required setbacks associated with wells, navigable waters, conduits to navigable waters, grassed waterways, wetlands, possible soil erosion/flow channels.
11. That surface applications of manure will not be completed when precipitation capable of producing runoff is forecasted within 24 hours of the time of planned application.

CONDITIONAL NUTRIENT MANAGEMENT PLAN APPROVAL

The Department hereby approves the 2021-2025 Roth Feeder Pig, Inc Nutrient Management Plan subject to the following conditions and the applicable requirements of Ch. NR 243, Wis. Adm. Code:

FIELD AND MANURE MANAGEMENT

1. Fields not included in the NMP and new fields shall not receive manure or process wastewater applications until they have been properly soil sampled, entered into Snap Plus, evaluated for their nutrient needs, and approved by the Department.
2. The following fields are prohibited from receiving applications of manure or process wastewater:

<ul style="list-style-type: none"> - T 1706 1 (default soil test) - T 1706 3 (default soil test) - T 1706 6 (default soil test) - T 1757 12 (default soil test) - T 1757 3 (default soil test) - T 4429 500 (>200 ppm P) - T 4430 26 (>200 ppm P) - Winter Pasture (default soil test) 	<ul style="list-style-type: none"> - T 1706 16 (default soil test) - T 1706 4 (default soil test) - T 1706 7 (default soil test) - T 1757 16 (default soil test) - T 4429 100 (>200 ppm P) - T 4430 23 (>200 ppm P) - T 4430 28 (>200 ppm P) 	<ul style="list-style-type: none"> - T 1706 2 (default soil test) - T 1706 5 (default soil test) - T 1757 1 (default soil test) - T 1757 2 (default soil test) - T 4429 200 (>200 ppm P) - T 4430 24 (>200 ppm P)_ - T 4430 32 (>200 ppm P)
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If Roth Feeder Pig, Inc wishes to use these fields for applications of manure or process wastewater all necessary information shall be submitted to the Department prior to application to demonstrate compliance

with NR 243 and other applicable codes. Written Department approval amending this condition approval must be received prior to application.

3. If existing fields yield a soil test results greater than 200 ppm P, those fields would be prohibited from receiving manure or process wastewater applications, unless you obtain Department approval in accordance with NR 243.14(5)(b)2., Wis. Adm. Code.
4. All liquid manure samples collected may be analyzed, at a minimum, for percent dry matter, total nitrogen, percent $\text{NH}_4\text{-N}$, percent $\text{NO}_3\text{-N}$, phosphorus, potassium, and sulfur.
5. If manure sample results have a dry matter (DM) content less than 2.0% and the percent ammonium (NH_4^+) is greater than 75% of the total N, Roth Feeder Pig, Inc may use the following equation to adjust the first year available nitrogen when applications are injected or incorporated within 1 hour:

$$\text{First-Year Available N} = \text{NH}_4\text{-N} + [0.25 \times (\text{Total N} - \text{NH}_4\text{-N})]$$

6. Roth Feeder Pig, Inc shall record daily manure applications by using form 3200-123A. These forms shall be retained at the farm and provided to the department upon request.
7. Roth Feeder Pig, Inc shall annually submit a spreading report that summarizes the land application activities listed under NR 243.19(3)(c)5., Wis. Adm. Code by using form Snap Plus Annual Reports.

WINTER SPREADING

8. Liquid manure applications during winter conditions, as defined by NR 243.14(7), Wis. Adm. Code, are prohibited with the exception of emergency applications.
9. As an emergency winter spreading strategy, the farm will utilize storage from a proposed operation named Roth Feeder Pig II, Inc. This operation would be proposed for construction in 2021. Roth Feeder Pig, Inc and Roth Feeder Pig II, Inc will maintain at least 1,000,000 gallons of storage for a winter contingency plan, which equivalates out to 38 days of manure production. This will be evaluated on an annual basis by November 30th of each year, Roth Feeder Pig, Inc and Roth Feeder Pig II, Inc will document that there is 180 days of storage available and the additional minimum of 1,000,000 gallons of storage for an emergency winter plan. The department concurs with this plan and will review annually through the Annual Update provided from the farm.
10. Winter spreading of solid and liquid manure may not occur during the “high risk runoff period” pursuant to s. NR 243.14(6)(c) and NR 243.14(7)(c), respectively.
11. Winter applications of liquid manure shall only occur under emergency situations, after notifying the Department and receiving verbal approval.
12. Liquid applications shall be limited to 3,500 gallons per acre or 30 lbs. P per acre, whichever is less, on slopes 2-6% and 7,000 gallons per acre or 60 lbs. P per acre, whichever is less, on slopes 0-2%. Winter applications of solid manure shall be limited to 60 lbs. P per acre.

HEADLAND STACKING

13. No headland stacking sites are approved.

MANURE & PROCESS WASTEWATER IRRIGATION

14. Irrigation of manure or process wastewater is prohibited.

SUBMITAL AND RECORDKEEPING REQUIREMENTS

15. A copy of this conditional approval shall be included in all future annual Nutrient Management Plan Updates in addition to the NR 243 and NRCS 590 checklists.

This conditional approval does not limit the Department's regulatory authority to require NMP revisions (based upon new information or manure irrigation research findings) or request additional information in order to confirm or ensure your farm operation remains in compliance with NR 243 and your WPDES permit conditions. If additional information, project changes or other circumstances indicate a possible need to modify this approval, the Department may ask you to provide further information relating to this activity.

Please keep in mind that approval by the Department of Natural Resources – Runoff Management Program does not relieve you of obligations to meet all other applicable federal, state or local permits, zoning and regulatory requirements.

If you have any questions regarding this approval I can be reached at 608-212-8460 or Ashley.Scheel@Wisconsin.gov.

Sincerely,



Ashley Scheel, CCA
WDNR Nutrient Management Plan Reviewer
Wisconsin Department of Natural Resources

cc: Claire O'Connell, WDNR Agricultural Runoff Specialist (Claire.OConnell@Wisconsin.gov)
Laura Bub, WDNR Watershed Field Supervisor (Laura.Bub@Wisconsin.gov)
Tyler Dix, CAFO Program Coordinator (Tyler.Dix@Wisconsin.gov)
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